

SAKAR 6.0-018

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

|                                  |   |                                |
|----------------------------------|---|--------------------------------|
|                                  |   |                                |
| ADJUSTACAM, L.L.C.               | : | Civil Action No. 6:10-cv-00329 |
| Plaintiff,                       | : |                                |
| vs.                              | : |                                |
| SAKAR INTERNATIONAL, INC., et al | : |                                |
| Defendants.                      | : |                                |
|                                  |   |                                |

**EXHIBIT 2**

**DESIGNATION OF TRIAL WITNESSES OF**  
**SAKAR INTERNATIONAL, INC., KOHL'S ILLINOIS, INC., AND**  
**KOHL'S CORPORATION**

The parties hereby designate the following Trial Witnesses:

| <b><u>Name</u></b>   | <b><u>Testimony</u></b>   |
|--|---|
| 1) Ralph Sasson, Vice President of Sakar International, Inc., 195 Carter Drive, Edison, NJ | Sakar's purchase and sales of accused Kodak webcams, where purchased, the prices, who developed the webcams, the customers, gross profits, net profits, cost of the web cam clip and cost of camera, how the web cams operate, no notice prior to lawsuit, and related matters; the amount of legal fees, costs, and expenses incurred by Sakar in this case. |

- 2) Santhosh George, Vice President of Sakar International, Inc., 195 Carter Drive, Edison, NJ
- Sakar's purchase and sales of accused Kodak webcams, where purchased, the prices, who developed the webcams, the customers, gross profits, net profits, cost of the web cam clip and cost of camera, how the web cams operate, no notice prior to lawsuit, and related matters.
- 3) David Krekelberg Minneapolis, MN
- Inventor with regard to his knowledge of prior art and the relevance of the Irfune prior art and other references.
- 4) Adjustacam's 30 (b)(6) witness – Clayton Haynes
- His knowledge of Adjustacam's Rule 11 pre-filing investigation, and his knowledge of Settlement Agreements entered into by Adjustacam with regard to the patent in suit, and his knowledge of royalty payments and royalty calculations.

### **Experts**

- 5) John Hamilton  
3031 Tisch Way, Suite 1010, San Jose, CA
- 6) Richard Klopp  
525 West Monroe Street, Suite 1050  
Chicago, IL
- 7) John Muskivitch  
San Francisco, CA
- 8) Walter Bratic  
Houston, TX

### **Testimony**

Topics sets forth in his Expert Report, including non-infringement, claim charts, rebutting the Report of Plaintiff's Expert on infringement and related matters.

Topics set forth in his Expert Report, including Invalidity, rebutting the Report of Plaintiff's Expert on validity, and related topics, the prosecution history in the U.S. Patent Office, the prior art, claim charts, the re-examination proceeding of the `343 patent in suit, the final rejection, and related topics.

His testimony regarding his two Expert Reports on infringement and validity.

His testimony regarding his Expert Report on settlements and damages.